

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
In re:	)	Chapter 7
	)	Case No. 23-40709-CJP
WESTBOROUGH SPE LLC,	)	
	)	
Debtor.	)	
_____	)	

LIMITED OBJECTION OF PETITIONING CREDITORS' TO EXPEDITED MOTION FOR  
COURT ASSISTANCE TO OBTAIN CRITICAL INFORMATION  
[Docket No. 437]

To The Honorable Christopher J. Panos, United States Bankruptcy Judge:

Now come the Petitioning Creditors herein and state the following as their limited objection to Lolonyon Akouete's Expedited Motion for Court Assistance to Obtain Critical Information (the "Motion to Obtain") as follows:

1. The Petitioning Creditors have no objection to Mr. Akouete obtaining whatever discovery he thinks he needs to try to overcome the Trustee's Objection to his Amended Proof of Claim but do not want the administration of this case to be bogged down by issues concerning the identity of the beneficial owner(s) of the Debtor and do not believe that the ownership of the Debtor needs to be determined by this Court in order to finally allow or disallow Mr. Akouete's Amended Proof of Claim.
2. Unless and until payment in full is distributed in accordance with all of 11 U.S.C. Sections 726(a)(1)-(5), the ownership of the Debtor is irrelevant.
3. Mr. Akouete does not claim any beneficial ownership in the Debtor (nor that his Amended Proof of Claim is based on having any beneficial ownership in the Debtor) and does not claim to have interacted in any way pre-petition with any party claiming beneficial ownership with respect to the bases for his Amended Proof of Claim.

WHEREFORE, the Petitioning Creditors pray that whatever relief this Court might be inclined to grant on the Motion to Obtain not in any way delay the claim allowance/disallowance process or allow that process to become mired in the determination of the beneficial (or legal) ownership of the Debtor's equity.

Respectfully submitted,

PETITIONING CREDITORS,

By their attorneys,

/s/ Stephen F. Gordon

Stephen F. Gordon (BBO No. 203600)

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Dated: December 13, 2024

CERTIFICATE OF SERVICE

I, Stephen F. Gordon, hereby certify that on December 13, 2024, the foregoing was served by operation of the Court's ECF System on all individuals designated to receive service by ECF:

- Jeffrey T Blake jblake@k-plaw.com
- Paul W. Carey pcarey@mirickoconnell.com, bankrupt@mirickoconnell.com
- Jose C. Centeio jcc@natgolaw.com
- Brian Charville bcharville@ferrisdevelopment.com
- Christine E. Devine christine@nicholsondevine.com,  
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and by email upon:

Lolonyon Akouete (info@smartinvestorsllc.com)

/s/ Stephen F. Gordon

Stephen F. Gordon (BBO No. 203600)

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